



Promoting the wise use of land

**COUNTY OF SAN LUIS OBISPO  
DEPARTMENT OF PLANNING AND BUILDING  
STAFF REPORT**

**Tentative Notice of Action**

MEETING DATE November 7, 2014 LOCAL EFFECTIVE DATE November 21, 2014 APPROX FINAL EFFECTIVE DATE December 12, 2014	CONTACT/PHONE Airlin M. Singewald, Project Manager (805) 781-5198 asingewald@co.slo.ca.us	APPLICANT Mari Gibbs	FILE NO. DRC2013-00039
<b>SUBJECT</b> A hearing to consider a request by Mari Gibbs for a Minor Use Permit/Coastal Development Permit to allow: a) the demolition of an existing single family residence; and b) the construction of a new two-story 2,799 square-foot single family residence with a 536 square-foot attached garage. The project would result in approximately 5,073 square feet of site disturbance on an existing 5,073 square-foot parcel in the Residential Single Family land use category. The existing residence to be demolished is located at 2194 Andover Place (023-205-018), approximately 150 feet west of Wilton Drive, in the community Cambria. The proposed residence would be located at 2090 Sherwood Drive (023-083-015), on the southeast corner of Sherwood Drive and Harvey Drive, in the community of Cambria. Both sites are in the North Coast planning area.			
<b>RECOMMENDED ACTION</b> Approve Minor Use Permit/Coastal Development Permit DRC2013-00039 based on the findings listed in Exhibit A and the conditions listed in Exhibit B.			
<b>ENVIRONMENTAL DETERMINATION</b> A Class 1 and Class 3 categorical exemptions were issued on September 19, 2014 (ED14-077).			
<b>LAND USE CATEGORY</b> Residential Single Family	<b>COMBINING DESIGNATION</b> Local Coastal Plan, Archeologically Sensitive Area, Terrestrial Habitat, Geologic Study Area	<b>ASSESSOR PARCEL NUMBER</b> 023-205-018 023-083-015	<b>SUPERVISOR DISTRICT(S)</b> 2
<b>PLANNING AREA STANDARDS:</b> Monterey Pine Forest Habitat (TH), Local Coastal Program Area (LCP), Archeological Sensitive Area, Water Conservation Requirements, Cambria Community Services District Review, Cambria Fire Department Review, Erosion Control, Landscaping, Exterior Lighting, Archeological Resource Protection, Residential Design Standards, Setback, Height, Footprint, and Gross Structural Area (GSA) Limitations <i>Does the project meet applicable Planning Area Standards: Yes - see discussion</i>			
<b>LAND USE ORDINANCE STANDARDS:</b> Coastal Commission Appealable Zone, Geologic Study Area (GSA), Local Coastal Program, Archaeologically Sensitive Area, Environmentally Sensitive Habitat (ESH), and Terrestrial Habitat Protection <i>Does the project conform to the Land Use Ordinance Standards: Yes - see discussion</i>			
<b>FINAL ACTION</b> This tentative decision will become the final action on the project, unless the tentative decision is changed as a result of information obtained at the administrative hearing or is appealed to the County Board of Supervisors pursuant Section 23.01.042 of the Coastal Zone Land Use Ordinance; effective on the 10th working day after the receipt of the final action by the California Coastal Commission. The tentative decision will be transferred to the Coastal Commission following the required 14-calendar day local appeal period after the administrative hearing. The applicant is encouraged to call the Central Coast District Office of the Coastal Commission in Santa Cruz at (831) 427-4863 to verify the date of final action. The County will not issue any construction permits prior to the end of the Coastal Commission process.			
ADDITIONAL INFORMATION MAY BE OBTAINED BY CONTACTING THE DEPARTMENT OF PLANNING & BUILDING AT: COUNTY GOVERNMENT CENTER γ SAN LUIS OBISPO γ CALIFORNIA 93408 γ (805) 781-5600 γ FAX: (805) 781-1242			

EXISTING USES: Single family residence (023-205-018); vacant (023-083-015)	
SURROUNDING LAND USE CATEGORIES AND USES: <i>North:</i> Residential Single Family/ residences <i>South:</i> Residential Single Family/ residences <i>East:</i> Residential Single Family/ residences <i>West:</i> Residential Single Family/residences	
OTHER AGENCY / ADVISORY GROUP INVOLVEMENT: The project was referred to: Public Works, Building Division, Cambria Community Services District (Water/Sewer/Fire), California Coastal Commission, North Coast Advisory Council, and Native American Heritage Commission.	
TOPOGRAPHY: Nearly level (both parcels)	VEGETATION: Monterey pines (023-083-015)
PROPOSED SERVICES: Water supply: Cambria Community Services District Sewage Disposal: Cambria Community Services District Fire Protection: Cambria Community Services District	ACCEPTANCE DATE: September 10, 2014

## DISCUSSION

The applicant is proposing to demolish an existing single family residence located at 2194 Andover Place in the Park Hill neighborhood of Cambria and construct a new single family residence located at 2190 Sherwood Drive in the Marine Terrace neighborhood of Cambria. The applicant has entered into an agreement with the Cambria Community Services District (CCSD) to transfer an existing water meter from the Andover parcel to the Sherwood parcel for the construction of the proposed residence. As a condition of the transfer agreement and this minor use permit, the applicant will be required to demolish the existing residence on Andover before constructing the new residence on Sherwood, and the Andover parcel will be permanently restricted from receiving water or sewer service. The applicant also paid sewer and water impact fees to the CCSD for 16 new water fixtures. The CCSD uses these fees to retrofit existing water fixtures in Cambria on a 2:1 basis. Therefore, the proposed project would not increase water demands in the community of Cambria.

Topographically both parcels are relatively level. The Andover parcel is located within the Terrestrial Habitat (TH) combining designation due to the Monterey pine forest and contains several pine trees. The vacant Sherwood parcel, where the new residence would be constructed, is not designated TH and is denuded of vegetation.

## PLANNING AREA STANDARDS

As described below, the project complies with applicable Combining Designations, Cambria Urban Area, and the Residential Single Family development standards of the North Coast Area Plan.

### Combining Designations

Monterey Pine Forest Terrestrial Habitat (TH)

The purpose of these standards is to minimize tree removal and avoid impacts to the sensitive Monterey pine forest habitat. All development within Monterey pine forest (TH) shall include the following minimum standards:

1. **Establishment of a 'project limit area'.** A project limit area shall be established in a manner that avoids Monterey pine forest impacts to the maximum extent feasible, is located on the least sensitive portion of the site, and safeguards the biological continuance of the habitat. The project limit area shall include all areas of the site where vegetation will need to be trimmed or removed for fire safety purposes.
2. **New Development siting.** Applications for new development within the Monterey pine forest shall demonstrate that no native vegetation outside the "project limit area" shall be removed, except for trees identified as hazardous by a qualified professional.
3. **Plan Requirements.** All site, construction and grading plans submitted to the County shall identify by species and diameter all Monterey pine trees that are six inches or more in diameter 4.5 feet above ground and oak trees four inches or more in diameter 4.5 feet above ground identified by species and diameter. The plans shall indicate which trees are to be retained and which trees are proposed for removal.
4. **Construction Practices.** Construction practices to protect Monterey pines, oak trees and significant understory vegetation shall be implemented.
5. **Replacement of Vegetation.** Any Monterey pine trees that are six inches or more in diameter 4.5 feet above the ground shall be replaced at a 4:1 ratio for each tree removed, and at a 2:1 ratio for each tree impacted but not removed. Any oak trees that are four inches in diameter 4.5 feet above ground shall be replaced at a 6:1 ratio for each tree removed, and at a ratio of 3:1 ratio for each tree impacted but not removed. All open areas of the site disturbed by project construction are to be seeded with native, drought and fire resistant species that are compatible with the habitat value of the surrounding forest.
6. **Understory Vegetation Removal.** No understory vegetation shall be removed until a permit has been issued or unless an immediate hazardous condition exists. Understory vegetation removal to create, improve, or maintain adequate defensible space and Fire Hazard Fuel Reduction shall be the minimum necessary

*The Sherwood parcel, where the proposed residence would be constructed, does not contain Monterey pines and is not designated TH. Therefore, construction of the proposed residence would not impact Monterey pine trees or other native vegetation.*

*The Andover parcel, where the existing residence is proposed for demolition, is designated TH and contains several pine trees. To minimize impacts to pine trees during demolition activities, the project is conditioned to designate a project limit area and provide highly visible protective fencing around all onsite pine trees.*

## **Cambria Urban Area Standards-Community Wide**

### Limitation on Development - Water Conservation Requirements

New development resulting in increased water use shall offset such increase through the retrofit of existing water fixtures within the Cambria Community Service District's service area, or through other verifiable actions to reduce existing water use in the service area. All coastal development permits authorizing such development shall be conditioned to require applicants to provide to the Planning Director for review and approval prior to construction, written evidence of compliance with CCSD Ordinance 1-98, as approved by the CCSD Board of Directors on January 26, 1998, and modified on November 14, 2002, and as codified in the CCSD Code Chapter 4.20 in 2004. Prior to application acceptance, land use and building permit applications shall include a written verification of water and sewer service from the CCSD. Also prior to final building inspection the applicant shall submit a water and sewer service condition compliance letter from the CCSD.

*The project complies with this standard because the applicant submitted a confirmation of water and sewer availability letter, dated August 5, 2014, verifying the payment of retrofit fees for the installation of 16 new water fixtures. The CCSD uses these fees to retrofit existing water fixtures in the CCSD service area to offset increased usage. The project is conditioned to require a water and sewer service condition compliance letter prior to final inspection.*

### Cambria Community Services District Review

Prior to application acceptance, land use and building permit applications shall include a written verification of water and sewer service from the CCSD. A water and sewer service condition compliance letter from the Cambria Community Services District shall be provided to the Department of Planning and Building prior to final building inspection.

*The project complies with this standard because the applicant submitted a confirmation of water and sewer availability letter, dated August 5, 2014, verifying the payment of retrofit fees for the installation of 16 new water fixtures.*

### Cambria Fire Department Review

All new development shall comply with applicable state and local Cambria fire codes. Prior to application acceptance, land use and building permit applications shall include a fire plan review from the Cambria Fire Department.

*The project complies with this standard because the applicant submitted a Fire Plan Review, dated July 14, 2014, from the Cambria Fire Department and the project is conditioned to comply with all applicable fire safety requirements.*

### Erosion Control

In addition to other applicable requirements of the Coastal Zone Land Use Ordinance, all runoff from impervious surfaces such as roofs, driveways, walks, patios, and/or decks shall be collected and retained on-site to the greatest extent possible. Run-off not able to be retained on-

site shall be passed through an effective erosion control device or filtration system approved by the Public Works Department. Impermeable surfaces should be minimized in order to maximize the amount of on-site run-off infiltration.

*The project is conditioned to comply with this requirement.*

#### Landscaping

All areas of the site disturbed by project construction shall be revegetated with native, drought and fire resistant species that are compatible with the habitat values of the surrounding forest. Non-native, invasive, fire prone, and water intensive (i.e. turf grass) landscaping shall be prohibited on the entire site. All landscaping and construction practices shall work to maintain and regenerate habitat values. Plant materials shall be used to mimic or enhance naturally occurring vegetation. Materials shall be propagated from appropriate native stock to ensure that the gene pool is not diluted for endemic species. This is particularly true for Monterey Pines and riparian plantings. A list of prohibited plants, such as Pampas grass and Scotch broom, is available from the Department of Planning and Building. Use of plants listed in the California Invasive Plant Council (Cal IPC) Invasive Plant Inventory is prohibited.

*The project is conditioned to comply with this requirement.*

#### Exterior Lighting

Use only the minimum amount necessary to achieve essential illumination. All light fixtures, including security lighting, shall be aimed and shielded so that the direct illumination shall be confined to the property boundaries source. Particular care is to be taken to assure that the direct illumination does not fall onto or across any public or private street or road. Motion sensing light fixtures shall be fully shielded and properly adjusted, according to the manufacturer's instructions, to turn off when detected motion ceases. All light fixtures are required to be fully shielded.

*The project is conditioned to comply with this requirement.*

#### Archaeological Resource Protection

New development projects that have the potential to impact archaeological resources shall be referred to the affected Native American tribe. In the event archaeological resources are unearthed or discovered during any construction activities, construction activities shall cease and the Environmental Coordinator and Planning Department shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, and disposition of artifacts may be accomplished in accordance with state and federal law. Construction activities shall not commence until a mitigation plan, prepared by a qualified professional archaeologist in consultation with appropriate Native American representatives and reviewed and approved by the Planning Director, is completed and implemented. The mitigation plan shall include measures to avoid the resources to the maximum degree feasible and shall provide mitigation for unavoidable impacts. A report verifying that the approved mitigation plan has been completed shall be submitted to the Planning Director prior to occupancy or final inspection, whichever occurs first. In the event archaeological resources are found to include

human remains, or in any other case where human remains are discovered during construction, the County Coroner is to be notified in addition to the Planning Department and Environmental Coordinator so that proper disposition may be accomplished.

*The project complies with this requirement because it was referred to the Native American Heritage Commission for review and comment, and the cultural resources assessment (Anastasio; April 2014) prepared for the project did not observe any prehistoric cultural material on the project site, immediate vicinity, or in close proximity.*

### **Residential Single Family Standards**

The following table describes the project's compliance with the applicable setbacks, height, gross structural area (GSA), and footprint standards of the North Coast Area Plan:

Lot Size: 5,073 square feet  
 Area: Marine Terrace  
 Oversized lot adjustment: 1.45

Slope: approximately 2%  
 Number of trees to be removed: 0  
 Base: 3,500 SF Footprint

PROJECT REVIEW	ALLOWABLE	TOTAL PROPOSED	STATUS
FOOTPRINT (SQUARE FEET)	2,393	2,369	OK
GSA (SQUARE FEET)	2,900	3,335	OK w/ 435 TDCs
HEIGHT (FEET)	22'	22'	OK
DECKS (SQUARE FEET)			
PERMEABLE	718	0	OK
SOLID	239	408 (roof deck)	OK <sup>1</sup>
SETBACKS (FEET)			
FRONT AND BACK COMBINED	25'	25'	OK
FRONT	10'	15'	OK
REAR	10'	10'	OK
SIDE	3' and 5' on street corner side	3' (left), 5' (right)	OK

NOTE: <sup>1</sup> Roof deck already included in footprint calculation.

### **Residential Design Criteria**

The North Coast Area Plan contains discretionary design criteria for single-family residential development in Cambria. The applicant submitted an analysis (attached) describing the project's compliance with the residential design criteria. This analysis is summarized below:

- a. Impermeable Surfaces: Impermeable surfaces have been minimized with an 18' wide driveway of permeable stone paver blocks on sand, an entry walkway of natural pavers

on sand, and individual stepping stones on sand instead of concrete with only one narrow concrete walkway shown for the service yard, under the second floor.

- b. **Parking Drives and Garages:** The garage is placed in the rear off Windsor Boulevard like all the other through-lots in this neighborhood of homes with double frontage, keeping this side of Sherwood Drive totally landscaped, specifically for pedestrians.
- c. **Topography:** With a nearly level lot, the proposed residence would follow the natural contours and visually enhance that trend by filling up slightly to the rear stucco fence and retaining wall to diminish the apparent height of the building and screen the rear yard from view.
- d. **Drainage:** The natural drainage patterns have been retained and enhanced with an additional ornamental (and functional) swale across the front corner, feeding naturally into the very prominent existing drainage swale, entering from the neighboring property to the south.
- e. **Building Design Standards:** The proposed project has an appearance that is compatible with the surrounding neighborhood. The proposed residence is proportional to the size of the parcel and, with the use of TDCs, complies with the gross structural and footprint requirements of the North Coast Area Plan. The building facades are organized in one story elements to reduce the apparent height, as viewed from all three public rights-of way (street frontages) and side yards. All second story elements are stepped in a series of increments. The proposed residence would have a stucco exterior finish consistent with 12 other homes within 300 feet of the project site.

## COASTAL ZONE LAND USE ORDINANCE STANDARDS

### **Section 23.01.043c.(3)(i): Appeals to the Coastal Commission (Coastal Appealable Zone)**

The project is appealable to the Coastal Commission because the subject parcel is located in an Environmentally Sensitive Habitat Area (Terrestrial Habitat).

### **Section 23.07.080 – Geologic Study Area (GSA) Combining Designation**

The proposed project is located within a Geologic Study Area (GSA) combining designation, and is subject to Section 23.07.080 Geologic Study Area. This section requires projects located within a GSA to include a report prepared by a certified engineering geologist. The report must identify, describe, and illustrate, where applicable, potential hazards of surface fault rupture, seismic shaking, and liquefaction or landslide.

*The proposed project complies with this standard because the applicant submitted a geotechnical engineering report (Beacon Geotechnical; March 20, 2014) which concluded the project site is geologically suitable for the proposed residence. The County Geologist reviewed the report and concurs with its conclusions and recommendations (Brian Papurello; August 27, 2014).*



### **Section 23.07.120: Local Coastal Program**

The project site is located within the California Coastal Zone as established by the California Coastal Act of 1976, and is subject to the provisions of the Local Coastal Program.

### **Section 23.07.104 – Archaeologically Sensitive Areas**

This Section requires development applications within the Archaeologically Sensitive combining designation area to include a preliminary archaeological site survey. The survey shall be conducted by a qualified archaeologist knowledgeable in local Native American culture and approved by the Environmental Coordinator. If the preliminary site survey determines that proposed development may have significant effects on existing, known or suspected archaeological resources, a plan for mitigation shall be prepared by a qualified archaeologist.

*The project complies with this requirement because it was referred to the Native American Heritage Commission for review and comment, and the cultural resources assessment (Anastasio; April 2014) prepared for the project did not observe any prehistoric cultural material on the project site, immediate vicinity, or in close proximity.*

### **Section 23.07.170.e(1-5) Environmentally Sensitive Habitat Area (ESHA) Development Standards**

1. New development within or adjacent to the habitat shall not significantly disrupt the resource.
2. New development within the habitat shall be limited to those uses that are dependent upon the resource.
3. Where feasible, damaged habitats shall be restored as a condition of development approval.
4. Development shall be consistent with the biological continuance of the habitat.
5. Grading adjacent to Environmentally Sensitive Habitats shall conform to the provisions of Section 23.05.034.c (Grading Standards)

### **Section 23.07.176 Terrestrial Habitat Protection**

The subject parcel supports a mapped Terrestrial Habitat (TH) combining designation, and is subject to Section 23.07.176 Terrestrial Habitat Protection. This section implements development standards for protection of Terrestrial Habitat. Specifically, that revegetation with native plants occurs where vegetation is removed, and that “readily-identifiable barriers that will protect the surrounding native habitat areas” be used to ensure protection during grading and construction.

*The Sherwood parcel, where the proposed residence would be constructed, does not contain Monterey pines and is not designated ESHA / TH. Therefore, construction of the proposed residence would not impact Monterey pine trees or other native vegetation.*



*The Andover parcel, where the existing residence is proposed for demolition, is designated ESHA / TH and contains several pine trees. To minimize impacts to pine trees during demolition activities, the project is conditioned to designate a project limit area and provide highly visible protective fencing around all onsite pine trees. No trees would be removed or impacted as a result of the project. In fact, the project would eliminate the existing building from the site, which could help preserve and improve the health of the existing onsite pine trees.*

## COASTAL PLAN POLICIES

Following is a list of the Coastal Plan Policies (discussion of specific applicable policies following):

Shoreline Access:	N/A
Recreation and Visitor Serving:	N/A
Energy and Industrial Development:	N/A
Commercial Fishing, Recreational Boating and Port Facilities:	N/A
Environmentally Sensitive Habitats: <input checked="" type="checkbox"/>	Policy No(s): 1, 3, 29, and 30
Agriculture:	N/A
Public Works: <input checked="" type="checkbox"/>	Policy No(s): 1
Coastal Watersheds: <input checked="" type="checkbox"/>	Policy No(s): 7 through 10
Visual and Scenic Resources: <input checked="" type="checkbox"/>	Policy No(s): 1, 2, and 7
Hazards: <input checked="" type="checkbox"/>	Policy No(s): 7
Archaeology: <input checked="" type="checkbox"/>	Policy No(s): 4
Air Quality:	N/A

***Does the project meet applicable Coastal Plan Policies:*** Yes, as conditioned.

## COASTAL PLAN POLICY DISCUSSION

### ***Environmentally Sensitive Habitats:***

Policy 1: Land Uses Within or Adjacent to Environmentally Sensitive Habitats: *The proposed project is consistent with this policy because it would remove an existing single family residence from the Monterey pine forest.*

Policy 3: Habitat Restoration: *The proposed project is consistent with this policy because the proposed project would not disturb (and may improve) the Monterey pine forest habitat since it would demolish an existing single family residence in a forested area and construct a new one in a non-forested area. As conditioned, highly visible protective fencing would be placed around trees to avoid impacts during demolition activities. No tree removal is proposed.*

Policy 29: Protection of Terrestrial Habitats: *The project is consistent with this policy because the proposed residence is a permitted use on the site and the demolition would remove an existing single family residence from the Monterey pine forest.*

Policy 30: Protection of Native Vegetation: *The project is consistent with this policy because a project limit area will be designated on all construction documents to ensure all development will not further encroach into any habitat areas or trees on site. All areas of the site disturbed will be revegetated with native plants.*

**Public Works:**

Policy 1: Availability of Service Capacity. New Development shall demonstrate that adequate public or private service capacities are available to serve the proposed development. *The project is consistent with this policy because the applicant submitted a confirmation of water and sewer availability letter, dated August 5, 2014, verifying the payment of retrofit fees for the installation of 16 new water fixtures. The project is conditioned to require a water and sewer service condition compliance letter prior to final inspection.*

**Coastal Watersheds**

Policy 7: Siting of New Development. *The project is consistent with this policy because the proposed residence would be located on a parcel with slopes of less than 20 percent.*

Policy 8: Timing of Construction and Grading. *The proposed project is conditioned to comply with this policy as the project shall have an erosion and sedimentation control plan where grading is conducted or left in an unfinished state during the period from October 15 through April 15.*

Policy 9: Techniques for Minimizing Sedimentation. *The proposed project is conditioned to comply with this policy as the applicant shall apply Best Management Practices in the selection and implementation of site maintenance.*

Policy 10: Drainage Provisions. *The proposed project is conditioned to comply with this policy as the applicant shall provide a drainage plan to the San Luis Obispo County Department of Public Works for review and approval, and shall implement the approved drainage plan, showing that construction of the addition will not increase erosion or runoff.*

**Visual and Scenic Resources**

Policy 1: Protection of Visual and Scenic Resources. *The proposed project complies with this policy, as the project will be developed on an existing residential lot. The lot is within a developed section of Cambria and shall be in character and scale with the surrounding neighborhood, and will not significantly block existing scenic vistas.*

Policy 2: Site Selection for New Development. *The proposed project is consistent with this standard, as the proposed addition will be developed on an existing residential lot, and the development will not block existing public views.*

Policy 7: Preservation of Trees and Native Vegetation. *The proposed project is consistent with this policy because it would not remove or adversely impact trees or native vegetation.*

**Hazards:**

Policy 7: Geologic Study Area Combining Designation. *The proposed project complies with this policy because the applicant submitted a geotechnical engineering report (Beacon*

*Geotechnical; March 20, 2014) which concluded the project site is geologically suitable for the proposed residence. The County Geologist reviewed the report and concurs with its conclusions and recommendations (Brian Papurello; August 27, 2014).*

**Archeology**

Policy 4: Preliminary Site Survey for Development within Archaeologically Sensitive Areas. *The project complies with this requirement because it was referred to the Native American Heritage Commission for review and comment, and the cultural resources assessment (Anastasio; April 2014) prepared for the project did not observe any prehistoric cultural material on the project site, immediate vicinity, or in close proximity.*

**COMMUNITY ADVISORY GROUP COMMENTS**

The North Coast Advisory Council (NCAC) reviewed the proposed project on October 15, 2014 and recommended denial due to concerns regarding increased water usage. As described in this report, the proposed project would demolish an existing single family residence on Andover Place and transfer an active service meter to the Sherwood parcel for the construction of a new single family residence. The applicant also paid sewer and water impact fees to the CCSD for 16 new water fixtures. The CCSD uses these fees to retrofit existing water fixtures in Cambria on a 2:1 basis. Therefore, the proposed project would not increase water demands in the community of Cambria.

#### AGENCY REVIEW

Public Works Tim Tomlinson	Drainage plan and encroachment permit for driveway required with building permit
Building Division Charles Riha	Project to comply with applicable building code and storm water regulations
CCSD (Water/Sewer)	See attached verification of water and sewer availability letter and fire plan review
California Coastal Commission	No response

#### LEGAL LOT STATUS

The two parcels were legally created by a subdivision at a time when that was a legal method for creating parcels.

Staff report prepared by Airlin Singewald and reviewed Bill Robeson.